

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

**HISHAM HAMED, individually,  
and derivatively for  
SIXTEEN PLUS CORPORATION,**

Plaintiffs/Counterclaim Defendant,

v.

**MANAL MOHAMMAD YOUSEF,**

Defendant/Counterclaim Plaintiff.

**CIVIL NO. SX-16-CV-00065**

**ACTION FOR  
DECLARATORY JUDGMENT  
CICO and FIDUCIARY DUTY**

**JURY TRIAL DEMANDED**

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**MANAL MOHAMMAD YOUSEF a/k/a  
MANAL MOHAMAD YOUSEF, *Plaintiff***

v.

**SIXTEEN PLUS CORPORATION,**

Defendant.

**CIVIL NO. SX-17-CV- 00342**

**ACTION FOR DEBT AND  
FORECLOSURE**

**COUNTERCLAIM FOR  
DAMAGES**

**JURY TRIAL DEMANDED**

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**SIXTEEN PLUS CORPORATION,**

Counterclaim Plaintiff,

v.

**MANAL MOHAMMAD YOUSEF a/k/a  
MANAL MOHAMAD,**

Counterclaim Defendants, and

**FATHI YUSUF,**

Third Party Defendant.

**FIRST INTERROGATORIES TO  
THIRD-PARTY DEFENDANT FATHI YUSUF**

**COMES NOW** Joel H. Holt, counsel for Sixteen Plus, and propounds the following interrogatories on Third-Party Defendant, Fathi Yusuf.

If any of the following Interrogatories cannot be answered in full, please answer to the extent possible, specify the reason for your inability to answer the remainder and state whatever information or knowledge you have concerning the unanswered portion. Where your investigation is incomplete, give all information known as of the date of signing your answer. Where exact data is unavailable, supply estimated data, indicate that you have done so, and explain the basis on which the estimate was made.

If you decline to answer any interrogatory, or portion of any interrogatory, on a claim of privilege or other basis for withholding an answer, such as the work product doctrine, state each privilege or other basis for withholding claimed and describe in detail all foundational facts upon which you base such claim of privilege or basis for withholding.

It is requested that all copies of all documents identified in response be attached to the answers to the responses to these Interrogatories as an exhibit.

Please take notice that these Interrogatories are deemed to be continuing up to and including the first day of trial of this action. If at any time you or any person acting on your behalf obtains additional information called for by these Interrogatories between the time of your response and the time set for trial, please serve supplemental sworn answers setting forth such information.

The words "**and**," as well as "**or**," shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the specifications all responses which might otherwise be construed to be outside its scope.

Terms in the plural include the singular and terms in the singular include the plural; the use of one gender shall include all others as appropriate in the context. These interrogatories are continuing in nature so as to require **you, the Defendant**, to file supplemental answers if any additional or different information responsive to these interrogatories is discovered or obtained subsequent to the filing of answers to these interrogatories.

### **TERMS AND MEANINGS**

The terms used in this Discovery have the following meaning:

As used herein, the term "**document(s)**" is used in its broadest sense to include, by way of illustration only and not by way of limitation, all originals and non-identical copies of any writing or any other tangible thing or data compilation in the custody, possession or control of the Defendant - whether printed, typed, reproduced by any process, written or produced by hand, including any graphic matter however produced or reproduced, or produced by any other mechanical means and all data, either electronic, magnetic, chemical, mechanical, or other form of data storage capable of being transformed into written or oral matter, including, but not limited to, CD-ROMs, DVDs, computer disks, Hard-drive computer storage mediums — including e-mails, letters, affidavits, filings, engineering studies and/or tests, reports, agreements, communications,

correspondence, permits, accounting records, business records, contracts, letters of agreements, telegrams, mailgrams, memoranda, summaries and/or records of personnel or telephone conversations, diaries, calendars, forecasts, photographs, tape recordings, facsimiles, models, statistical statements, graphs, charts, plans, drawings, service and/or pump data, logs, minutes or records of meetings, minutes or records of conferences, reports and/or summaries of interviews, reports, conversations, summaries of investigations, opinions or reports of consultants, topographical or geological maps or surveys, appraisals, records, reports or summaries of negotiations, drafts of any document, revisions of drafts of any document, purchase orders, invoices, receipts, original or preliminary notes, financial statements, accounting work papers, promissory notes, film, microfilm, microfiche, punch cards, slides, pictures, videotapes, moving pictures, computer programs, laboratory results, magnetic tapes or any other matter which is capable of being read, heard or seen with or without mechanical or electronic assistance.

**"Communication"** means any correspondence, contact, discussion, exchange, contract, or agreement between any two or more persons. Without limiting the foregoing, "communication" includes all documents, as defined above, telephone conversations, internet communications, e-mail, facsimile transmissions, voice mail, face-to-face conversations, meetings, and conferences.

**"Relevant time period"** means 1995 to present.

**"Manal Mohammad Yousef"** or **"Manal"** shall mean the party herein.

**Interrogatory #1:**

Describe in detail all correspondence or other communications you have had with third parties seeking to buy, offering to but or expressing interest in buying the property subject to the note and mortgage herein.

**Interrogatory #2:**

Describe in detail all correspondence or other communications you have had with Jamil, Isam or Manal regarding the note and mortgage herein.

**Interrogatory #3:**

Describe in detail all correspondence or other communications you have had with any bank or bank officials in the USVI, St. Martin, St. Marteen, Jordan, the West Bank or elsewhere regarding:

1. the funds used for the note and mortgage herein.
2. the funds used by Sixteen Plus for the purchase of the property subject to the note and mortgage herein.

**Interrogatory #4:**

Describe in detail all discussions, negotiations or communications with any person of entity with regard to the funds used to purchase the subject property herei



**Dated:** August 16, 2022

/s/ \_\_\_\_\_

**Joel H. Holt. (Bar # 6)**

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**Carl J. Hartmann III, Esq.**

*Co-Counsel for Defendants*

### **CERTIFICATE OF SERVICE**

I hereby certify that this document complies with the page or word limitation set forth in Rule 6-1(e) and that on August 16, 2022, I served a copy of the foregoing by email, as agreed by the parties, as well as a copy mailed to James Hymes at the address below, on:

*Charlotte Perrell*

*Stefan Herpel, Esq.*

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/s/ Carl J. Hartmann III